



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 28, 2020

**VIA ECF AND E-MAIL**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Abduraman Iseni*, 20 Cr. 660 (ALC)**

Dear Judge Carter:

The Government respectfully submits this letter motion, with the consent of defense counsel, to request that the Court exclude Speedy Trial time until the initial pre-trial conference on January 27, 2021 at 10:00 a.m.

As background, on December 10, 2020, agents arrested 13 of the 16 charged defendants and all 13 of these defendants were arraigned that same day before the Honorable Sarah Netburn, United States Magistrate Judge. Judge Netburn excluded Speedy Trial time until December 28, 2020. The Court has scheduled the initial pre-trial conference for January 27, 2021 at 10:00 a.m. With respect to discovery, the Government will confer with defense counsel regarding a protective order and the potential appointment of a Coordinating Discovery Attorney (“CDA”) on behalf of all defendants. So that the parties may discuss possible pre-trial dispositions; confer regarding and, upon entry of the protective order, begin producing and reviewing discovery; and prepare for the initial pre-trial conference, the parties respectfully request that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today’s date, December 28, 2020, up to and including January 27, 2021, the date of the initial pre-trial conference before the Court, and

submit that such exclusion of time is in the interest of justice. Counsel to the 13 defendants consent to this request.

Very truly yours,

AUDREY STRAUSS  
Acting United States Attorney

by: /s/ David R. Felton  
Samuel Raymond / David R. Felton  
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cc: All defense counsel (by ECF and e-mail)